

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK-----X  
JUAN SANCHEZ,

Plaintiff,

Index:

-against-

**SUMMONS**GENEVA MORTON, LOOMIS FARGO & CO., and  
LOOMIS ARMORED US, LLC,

Defendants.

Basis of Venue:

Plaintiff Residence

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To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

*Plaintiff's residence: 623 West 170th Street, Apt. 5C, New York , NY 10032*

Dated: New York, New York  
May 12, 2021

Yours, etc.

  
Aaron R. Haimowitz, Esq.  
HACH & ROSE, LLP  
Attorneys for Plaintiff  
**JUAN SANCHEZ**  
112 Madison Avenue, 10<sup>th</sup> Floor  
New York, NY 10016  
T. 212.779.0057  
F. 212.779-0028

To: GENEVA MORTON  
27 CUTLER STREET  
NEWARK, NJ 07104LOOMIS FARGO & CO.  
1601 HYLTON ROAD  
PENNSAUKEN, NJ 08110LOOMIS ARMORED US, LLC,  
C T CORPORATION SYSTEM  
28 LIBERTY ST.  
NEW YORK, NEW YORK, 10005

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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JUAN SANCHEZ,

Index No.

Plaintiff,

**VERIFIED COMPLAINT**

-against-

GENEVA MORTON, LOOMIS FARGO & CO., and  
LOOMIS ARMORED US, LLC,

Defendants.

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Plaintiff, JUAN SANCHEZ, by his attorneys, HACH & ROSE, LLP, as and for a cause of  
action allege upon information and belief as follows:

**AS AND FOR A FIRST CAUSE OF  
ACTION ON BEHALF OF PLAINTIFF**

1. On or about July 24, 2020, and at all times herein mentioned, the Plaintiff, JUAN  
SANCHEZ, was and still is a resident of the County of New York, State of New York;

2. This action falls within one or more of the exceptions set forth in CPLR Section 1602;

3. The cause of action herein arose in the County of New York, State of New York;

4. Upon information and belief, on or about July 24, 2020, and at all times herein  
mentioned, Defendant GENEVA MORTON was a resident of the state of New Jersey;

5. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS  
FARGO & CO. was and is a domestic corporation duly organized and existing under and by virtue  
of the laws of the State of New York.

6. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS  
ARMORED US, LLC was and is a domestic corporation duly organized and existing under and by  
virtue of the laws of the State of New York.

7. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS FARGO & CO. was a foreign limited liability company duly organized and existing under and by virtue of the laws of the State of New York;

8. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS ARMORED US, LLC was a foreign limited liability company duly organized and existing under and by virtue of the laws of the State of New York;

9. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS FARGO & CO. was the owner of a motor vehicle bearing New Jersey State license plate number XU500F;

10. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS ARMORED US, LLC was the owner of a motor vehicle bearing New Jersey State license plate number XU500F;

11. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS FARGO & CO. was the registrant of the aforesaid vehicle;

12. On or about July 24, 2020, and at all times herein mentioned, Defendant LOOMIS ARMORED US, LLC was the registrant of the aforesaid vehicle;

13. On or about July 24, 2020, and at all times herein mentioned, Defendant GENEVA MORTON operated the aforesaid motor vehicle, bearing license plate number XU500F, in the course of her employment for Defendant LOOMIS FARGO & CO.;

14. On or about July 24, 2020, and at all times herein mentioned, Defendant GENEVA MORTON operated the aforesaid motor vehicle with the permission of the owner, Defendant LOOMIS FARGO & CO.;

15. On or about July 24, 2020, and at all times herein mentioned, Defendant GENEVA MORTON operated the aforesaid motor vehicle, bearing license plate number XU500F, in the course of her employment for Defendant LOOMIS ARMORED US, LLC;

16. On or about July 24, 2020, and at all times herein mentioned, Defendant GENEVA MORTON operated the aforesaid motor vehicle with the permission of the owner, Defendant LOOMIS ARMORED US, LLC;

17. On or about July 24, 2020, and at all times herein mentioned, Defendant GENEVA MORTON controlled the aforesaid motor vehicle while in the course of her employment for Defendant LOOMIS FARGO & CO.;

18. On or about July 24, 2020, and at all times herein mentioned, Defendant GENEVA MORTON controlled the aforesaid motor vehicle while in the course of her employment for Defendant LOOMIS ARMORED US, LLC;

19. On or about July 24, 2020, and at all times herein mentioned, Plaintiff JUAN SANCHEZ was a pedestrian;

20. On or about, July 24, 2020, and at all times herein mentioned, West 171<sup>st</sup> Street and Broadway in New York, NY, were public roadways and/or thoroughfares;

21. On or about, July 24, 2020, at the aforesaid location, the vehicle owned by Defendant LOOMIS FARGO & CO. and operated by Defendant GENEVA MORTON came into contact with Plaintiff JUAN SANCHEZ;

22. On or about, July 24, 2020, at the aforesaid location, the vehicle owned by Defendant LOOMIS ARMORED US, LLC and operated by Defendant, GENEVA MORTON came into contact with Plaintiff JUAN SANCHEZ;

23. As a result of the occurrence, Plaintiff JUAN SANCHEZ was seriously injured;

24. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto;

25. That the negligence of the Defendants consisted of, but not limited to, operating the aforesaid motor vehicles in a negligent, reckless and careless manner; in failing to keep the aforesaid motor vehicles under reasonable and proper control; in failing to operate the aforesaid motor vehicles with due regard for the safety of the public and others; in failing to keep a proper lookout, in failing to observe what was available to be observed; in failing to observe the Plaintiff was a pedestrian; in operating the aforesaid motor vehicles in a manner contrary to, and in violation of, the statutes, ordinances, rules and regulations applicable and in existence on the date of the occurrence; in failing to provide and/or make prompt and timely use of adequate and efficient brake and steering mechanisms; in operating the aforesaid motor vehicles in such a negligent, careless and reckless manner as to precipitate the aforesaid occurrence; in failing to take defensive action; and in failing to warn of the approach of the aforesaid motor vehicles, in going through a red light;

26. That by reason of the foregoing, Plaintiff JUAN SANCHEZ has sustained a serious injury as defined by Section 5102 of the Insurance Law;

27. That by reason of the foregoing, Plaintiff JUAN SANCHEZ has been damaged in an amount exceeding the jurisdictional limits of all lower courts of the State of New York.

**WHEREFORE**, Plaintiff JUAN SANCHEZ demands judgment against the Defendants herein on The First Cause of Action in an amount exceeding the jurisdictional limits of all lower courts of the State of New York, together with the interests, costs and disbursements of this action.

Dated: New York, New York  
May 11, 2021

Yours, etc.,

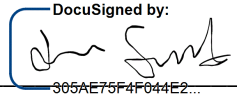
  
Aaron R. Haimowitz, Esq.  
HACH & ROSE, LLP  
Attorneys for Plaintiff  
**JUAN SANCHEZ**  
112 Madison Avenue, 10<sup>th</sup> Floor  
New York, NY 10016  
(212) 779-0057

VERIFICATION

STATE OF NEW YORK     )  
  ) SS:  
COUNTY OF NEW YORK    )

I, JUAN SANCHEZ, being duly sworn, depose and say:

I am the plaintiff in the within action; I have read the foregoing **SUMMONS AND COMPLAINT** and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters I believe to be true.

X  DocuSigned by:  
305AE75F4F044E2...  
JUAN SANCHEZ

Sworn to before me  
\_\_\_\_\_ day of \_\_\_\_\_, 2021.  
February 24, 2021.

 DocuSigned by:  
EBB7B4E35D2D49F...  
Notary Public

BIANCA MERCADO  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01ME6389771  
Qualified in Bronx County  
My Commission Expires 04/08/2023



SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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-against-

GENEVA MORTON, LOOMIS FARGO & CO., and  
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Defendants.  
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**NOTICE OF COMMENCEMENT OF ACTION  
SUBJECT TO MANDATORY ELECTRONIC FILING**

PLEASE TAKE NOTICE that the matter captioned above, which has been commenced by filing of the accompanying documents with the County Clerk, is subject to mandatory electronic filing pursuant to Section 202.5-bb of the Uniform Rules for the Trial Courts. This notice is being served as required by Subdivision (b) (3) of that Section.

The New York State Courts Electronic Filing System ("NYSCEF") is designed for the electronic filing of documents with the County Clerk and the court and for the electronic service of those documents, court documents, and court notices upon counsel and self-represented parties. Counsel and/or parties who do not notify the court of a claimed exemption (see below) as required by Section 202.5-bb(e) must immediately record their representation within the e-filed matter on the Consent page in NYSCEF. Failure to do so may result in an inability to receive electronic notice of document filings.

Exemptions from mandatory e-filing are limited to: 1) attorneys who certify in good faith that they lack the computer equipment and (along with all employees) the requisite knowledge to comply; and 2) self-represented parties who choose not to participate in e-filing. For additional information about electronic filing, including access to Section 202.5-bb, consult the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center at 646-386-3033 or [efile@couns.state.ny.us](mailto:efile@couns.state.ny.us).

Dated: New York, New York  
May 12, 2021

  
Aaron R. Haimowitz, Esq.  
HACH & ROSE, LLP  
Attorney for Plaintiff  
**JUAN SANCHEZ**  
112 Madison Avenue, 10<sup>th</sup> Floor  
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SUPREME COURT OF THE STATE OF NEW YORK  
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JUAN SANCHEZ,

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**SUMMONS AND COMPLAINT**  
  
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Attorneys for Plaintiff  
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